

**Michigan's  
Resource Conservation  
and Recovery Act**

**Work Plan for Fiscal Year 2009**



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## **1.0 INTRODUCTION**

This Resource Conservation and Recovery Act of 1976 (RCRA) Grant Work Plan for fiscal year 2009 (Work Plan) describes work the Michigan Department of Environmental Quality (MDEQ), Waste and Hazardous Materials Division (WHMD), is committing to accomplish during fiscal year (FY) 2009, October 1, 2008, to September 30, 2009 (FY09). This work fulfills the WHMD's obligations in its role of administering the national Solid Waste Disposal Act in Michigan, as amended by the RCRA, as amended by the Hazardous and Solid Waste Amendments of 1984.

The Director of the MDEQ functions as the designated representative of the Administrator of the U.S. Environmental Protection Agency (U.S. EPA).

## **1.1 ORGANIZATION OF THE WORK PLAN**

This Work Plan is organized in two sections, as follows:

### Introduction

This section consists of an overview of the Work Plan detailing its organization and the guidance used in its development.

### Programs, Strategic Planning, and Scheduled Activities

This section consists of a narrative of the MDEQ priorities for the year, including strategic planning activities. This narrative includes a description of how the overall program priorities coincide or vary from the U.S. EPA guidance and description of state-specific initiatives and priorities. A detailed account of priority activities specific to each program element, how activities relate to the U.S. EPA guidance, and further background on state priorities are provided. The program elements are as follows:

- Compliance and Enforcement
- Administrative Controls (permits, closure, approved postclosure plans)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

Finally, for each program element, there are schedules of activities planned for the year (inspections, permits, etc.). Schedules show midyear milestones and end-of-year commitments.

## **1.2 GUIDANCE DOCUMENTS USED TO DEVELOP WORK PLAN**

The U.S. EPA guidance document used to develop this Work Plan is:

- *FY2009 National Program Manager's Guidance, April 2008, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*

## **1.3 FY08 RCRA GRANT WORK YEAR DISTRIBUTION**

The following table shows the distribution of full-time equivalent (FTE) work years among the various elements and objectives of the Work Plan. If there is any

discrepancy in this Work Plan between this table and the Work Plan text, this table takes precedence.

<b>RCRA Work Plan Program Element</b>	<b>Work Years</b>
Statutory/Regulatory/Application Development <ul style="list-style-type: none"> <li>• Obtain/Maintain Authorization</li> </ul>	1
Compliance Monitoring and Enforcement <ul style="list-style-type: none"> <li>• Inspections and/or Record Review</li> <li>• Timely and Appropriate Enforcement Action</li> <li>• Corrective Action Compliance and Enforcement</li> <li>• Manifest Processing</li> <li>• Hazardous Waste Technical Support Unit (TSU)</li> <li>• Waste Classification</li> <li>• Laboratory Support</li> </ul>	32
Administrative Controls <ul style="list-style-type: none"> <li>• Permits</li> <li>• Postclosure Plans</li> <li>• Closures</li> <li>• Public Participation</li> <li>• TSU</li> </ul>	6
Corrective Action <ul style="list-style-type: none"> <li>• Planning and Priority Setting</li> <li>• Oversight</li> <li>• TSU</li> <li>• Waste Classification</li> <li>• Permitting/Closure/Corrective Action Tracking</li> <li>• Laboratory Support</li> <li>• Enforcement</li> </ul>	13
Management and Reporting <ul style="list-style-type: none"> <li>• Administrative Activities</li> <li>• Information Management and Reporting</li> <li>• Training</li> <li>• Information Requests</li> <li>• Laboratory Coordination</li> </ul>	13
<b>RCRA Total FTE Work Years</b>	<b>65</b>

## **2.0 PROGRAMS, STRATEGIC PLANNING, AND SCHEDULED ACTIVITIES**

### **2.1 INTRODUCTION**

#### **Program Elements**

In FY09 the MDEQ will use six elements in an effective state program to manage hazardous waste through a delegation of RCRA authorities. These six elements are:

- Compliance and Enforcement
- Administrative Controls (permits, closure, and orders)
- Corrective Action
- State Authorization
- Waste Minimization
- Management and Reporting

The FY09 program priorities for the MDEQ, including any strategic planning activities, are discussed below. The discussion is organized into the program elements as listed above.

In Section 2 of the Work Plan, the following program and strategic planning information are presented for each of the program elements:

- the goal for the program element
- the priorities for the program element
- the MDEQ program strategy discussion
- the MDEQ objective discussion for the program element
- the MDEQ considerations discussion for the program element
- the MDEQ scheduled activities discussion, by district and units

In order for the Work Plan to be useful to the staff performing the work, the scheduled activities are grouped by WHMD office and section, where appropriate, allowing staff to view FY09 program priorities for their office.

### **2.2 COMPLIANCE AND ENFORCEMENT**

#### **Goal**

Ensure that hazardous wastes are managed in a manner that protects human health and the environment by attaining and maintaining a high level of compliance within the regulated community. This includes ensuring the safe management of hazardous and nonhazardous waste and the cleanup of hazardous and nonhazardous releases.

#### **Priority**

Compliance assistance activities should focus on newly-regulated facilities, facilities subject to new regulations, and other small businesses with compliance problems. Also, encourage the regulated community to voluntarily discover, disclose, and correct violations before being identified by regulatory agencies.

Consistent with Part 111, Hazardous Waste Management, of the Michigan Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), the U.S. EPA, Office of Enforcement and Compliance Assurance's (OECA) and MDEQ guidelines, the following details the inspection frequencies being targeted:

- federal facilities; annually
- active operating treatment, storage, and disposal (TSD) facilities; at a minimum of annually
- remaining active nonoperating TSD facilities; every other year
- twenty percent of the large quantity generators (LQGs); annually
- an appropriate level of small quantity generators (SQGs); annually

### **Compliance Program Strategy Discussion**

Field compliance activities during FY09 will focus on the following activities in the Great Lakes watersheds instead of concentrating on priority industrial sectors:

- Inspect and conduct the necessary follow-up activities at all categories of generators. The MDEQ inspection schedule for active TSD facilities usually meets or exceeds the OECA core program. The MDEQ will continue to conduct inspections at 20 percent of LQGs.
- Program improvements include continued attention to inspection quality and identification and tracking of responses to violations. That, coupled with a broader inspection emphasis, allows staff to provide compliance assistance, including pollution prevention and waste information, directly to the regulated community.
- Continue review of facility status in comparison to manifested waste data and follow up as appropriate.
- Continue development and subsequent implementation of a plan to address facilities that have not paid hazardous waste user charges.
- Continue implementation of program to collect manifest data from nonreporting sites.
- Continue review of identified manifest discrepancies.
- Continue efforts to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliance with other transporter requirements.

### **Objective**

Put forth efforts to prevent environmental harm by encouraging and helping the regulated community meet legal obligations by identifying and correcting violations that occur in order to foster program integrity and deter future violations or violations by others.

## **Considerations**

- 1) Effect of the MDEQ's planning and priority-setting activities, as indicated by its compliance monitoring and enforcement strategy, in achieving the program element's objective.
- 2) Effect of the MDEQ's compliance monitoring activities as indicated by:
  - a) Status of inspection and record review activities as described in the Work Plan.
  - b) Effect of tools (e.g., inspection checklists) and techniques (e.g., sampling) used in compliance monitoring activities.
  - c) Accuracy and completeness of inspections and followup.
  - d) Effectiveness of communication with the U.S. EPA on compliance monitoring-related activities.
  - e) Effect of other activities, such as compliance assistance and encouraging the regulated community to meet legal obligations.
- 3) Effect of the MDEQ's enforcement activities as indicated by:
  - a) Nature, timeliness, and appropriateness of enforcement actions.
  - b) Degree of support afforded other enforcement officials.
  - c) Nature of followup to enforcement actions.
  - d) Effectiveness of communication with the U.S. EPA on enforcement-related issues.

## **Scheduled Activities: District and Field Offices**

### **Generator Focus**

The MDEQ will continue to focus inspection activities on all categories of generators. Experience continues to demonstrate that the frequency and magnitude of violations increase substantially if inspection frequency extends past five-year cycles for LQGs and three-year cycles for hazardous waste transporters. However, while the MDEQ will organize work toward achieving these inspection frequencies, current staffing levels will prevent them from being met. Consequently, decisions about which generators to inspect will be based on risk criteria and management factors as outlined in the WHMD and the specific district's neutral criteria plan.

The generator focus extends to any facility that has obtained an identification number, including conditionally exempt small quantity generators (CESQGs). Staff continues to find that these smaller generators often have both substantial compliance issues to resolve because of a relative lack of sophistication on regulatory requirements and meaningful opportunities for waste reduction. As a result, MDEQ inspections afford effective opportunities to assist facilities to gain compliance status, help identify improved disposal options, and provide information on waste reduction.

As stated in Section 2.2, Compliance and Enforcement, to assist in the overall program effectiveness, the MDEQ will develop and implement plans to provide some emphasis for certain generators and certain transporters. Specifically, subject to the availability of data, the MDEQ will:

- Review sites' status in comparison to manifested waste data.
- Address sites that have not paid hazardous waste user charges.
- Collect manifest data from nonreporting sites.
- Review manifest discrepancies during evaluations.

The MDEQ will continue to inspect commercial TSD facilities that can accept waste under the Comprehensive Environmental Response, Compensation, and Liability Act, Title 42 of the United States Code, Section 9601 *et seq.* (CERCLA), at least twice per year and any federal TSDs annually. Other TSD compliance evaluation inspections (CEIs) will be assessed individually to determine those for which inspections will provide the greatest environmental benefit. Certain TSD facilities, such as closed or inactive facilities awaiting postclosure licenses, may not be inspected annually.

As stated in Section 2.2, Compliance and Enforcement, the MDEQ will continue efforts to identify and address transporters of hazardous waste without a registration and permit and/or financial responsibility (i.e., fleet liability coverage for accidental occurrences arising from hazardous materials transportation activities). These efforts are expected to identify noncompliances with other transporter requirements.

#### Compliance Assistance and Compliance Incentives

Two aspects of the OECA core program are compliance assistance and compliance incentives. The MDEQ does not organize program activities by these terms. Rather, these functions are met through several means:

- Interaction by compliance staff on a day-to-day basis assists the regulated community in achieving compliance. For example, inspectors provide written material on common compliance requirements such as secondary containment, manifest tracking, and universal waste.
- Individual staff members spend concentrated time preparing compliance information. Such pieces include those noted above as well as tailored presentations to trade associations and interest groups. In addition, the MDEQ, Environmental Science and Services Division (ESSD), undertakes complex, detailed projects of compliance assistance/incentives. See also Section 2.6, Waste Minimization, for a discussion of other ESSD compliance assistance and compliance incentive programs.
- The MDEQ Web site provides ready access to guidance documents and compliance information. The MDEQ inspectors regularly educate members of the regulated community in the use of the MDEQ Web site and informational systems.



- Continue to upgrade the browser-independent Web site on the Internet that allows the public to view compliance information regarding sites with hazardous waste activity. This will continue to expand the current availability of manifest and general site information available to the public.

#### Program Improvements

The MDEQ will continue to review and, where identified, improve the overall management and operation of the compliance and enforcement program.

- The MDEQ believes that improving the effectiveness and efficiency of inspections is important to meeting overall program goals. Staff continues to concentrate on data quality in the WHMD database, Waste Data System (WDS). This effort will provide accurate data that will be used to improve the consistency and timeliness of inspections and follow up. Inspectors are also developing plans to use this data to further enhance inspections (see above).
- WHMD staff will continue to review inspection procedures for effectiveness and refine them for continued improvement, as needed.

#### Scheduled Activities: Field Offices and TSU Staff

Approximately 16 FTE positions will be devoted to field inspection activities during FY09. This includes approximately 14 district field staff FTE positions and 2 TSU staff FTE positions. The work performed by these personnel normally falls into the following categories:

- evaluations at TSD facilities
- evaluations at fully regulated generators
- evaluations at SQGs
- evaluations at CESQGs
- evaluations at other notifiers
- evaluations at transporters
- follow-up inspections
- administrative and civil enforcement activities and support
- complaints
- compliance assistance presentations and material development work
- compliance monitoring evaluations
- construction inspections
- closure/postclosure in progress inspections
- corrective action in progress inspections
- closure certification inspections
- sampling inspections
- marketer/oil burner inspections
- waste characterization
- joint U.S. EPA/MDEQ inspections
- record reviews
- waste minimization presentations
- community-based initiative participation

- criminal transporter enforcement (not part of the MDEQ, Office of Criminal Investigations [OCI], initiative)
- all other criminal case work (including criminal case development, prosecutor acceptance of criminal case, criminal complaint and summons issued, and pretrial and trial stages)
- program improvement activities
- operation and maintenance inspections
- inspections of used oil transporters, used oil transfer facilities, and used oil processor/re-refiners

#### District Field Staff Inspection Schedule

Field staff will perform the following designated activities during FY09. These designated activities represent 65 percent (8.90) of the total (13.71) Compliance Monitoring and Evaluation (CME) field FTE positions.

<u>CEI Category</u>	<u>No. of Inspections</u>
TSD Facility	85
LQGs	133
Hazardous Waste Transporter	26
SQGs	308

Eighty-five inspections will be conducted within the universe of sixty-five TSD facilities. A list of specific facilities and planned inspection quarters is provided below for information only and is not considered a commitment of the Work Plan. The MDEQ does commit to conduct at least one inspection at each federal TSD facility and two inspections at each TSD facility accepting CERCLA waste. The proposed inspection activity is predicated on full staffing. FTE positions not filled will affect the ability to complete the projected inspections.

<b>Site ID</b>	<b>Site Name for TSDF</b>	<b>Quarter(s)*</b>	<b>District</b>
MID057002602	Advanced Resource Recovery, LLC	FY10 - 3rd	SE Mich
MID005363114	Arkema, Inc.	3rd	SE Mich
MID985568021	Chemical Analytics, Inc.	2nd and 4th	SE Mich
MID061862926	Central Products Co. (Intertape)	FY10 - 1st	SE Mich
MID098011992	Le Petomane VII Custodial Trust (CyanoKEM)	1st and 3rd	SE Mich
MID091605972	Detrex Corp. Site A	1st, 2nd, 3rd, and 4th	SE Mich
MID074259565	Dynecol, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MIR000016055	Environmental Disposal Systems, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MID980991566	EQ Detroit, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MID060975844	EQ Resource Recovery, Inc.	1st, 2nd, 3rd, and 4th	SE Mich
MID980568711	FMC Allen Park Clay Mine Landfill	1st and 3rd	SE Mich
MID005338801	Gage Products Co.	1st and 3rd	SE Mich
MID050616622	General Electric Co.	1st	SE Mich
MID005356910	GMNA Property Mgmt. Fiero Facility	FY10 - 2nd	SE Mich
MID005356886	GMC Metal Fabricating Division	FY10 - 2nd	SE Mich
MID050615996	GMC Technical Center	1st, 2nd, 3rd, and 4th	SE Mich
MID005378161	Michigan Chrome & Chemical Co.	1st	SE Mich
MID000724831	Michigan Disposal Waste Treatment Pl.	1st, 2nd, 3rd, and 4th	SE Mich

Site ID	Site Name for TSDF	Quarter(s)*	District
MID082767591	Michigan Seamless Tube LLC	FY10 - 1st	SE Mich
MID980615298	Petro-Chem Processing Group of Nortru	1st, 2nd, 3rd, and 4th	SE Mich
MID009708678	Solutia, Inc.	1st	SE Mich
MID980793467	Univertical Solder Alloys	FY10 - 3rd	SE Mich
MID048090633	Wayne Disposal, Inc., Site #2	1st, 2nd, 3rd, and 4th	SE Mich
MID000810408	Woodland Meadows Landfill North	4th	SE Mich
MID004508628	AMPCO Pittsburgh Corp (Wyckoff Steel)	1st	SE Mich
MID980825632	MDNR Roscommon Toxaphene Pit	4th	Cadillac
MID053343976	Michigan State University	1st, 2nd, and 3rd	Lansing
MID005356712	GMC NAO Flint Operations	FY10 - 2nd	Lansing
MID005356860	GMC Delphi Coldwater Road	3rd	Lansing
MID005358130	Michigan Reutilization LLC (Total Petroleum)	1st and 3rd	Lansing
MID005356647	Delphi Automotive Systems LLC	2nd	Lansing
MID082771700	Granger Land Development Co.	FY10 - 3rd	Lansing
MID980506265	Grand Blanc Landfill	3rd	Lansing
MID980568620	Delphi Automotive Systems LLC	2nd	Lansing
MID000020743	REALM Coldwater	FY10 - 1st	Lansing
MID980617435	The Dow Chemical Co. Salzburg Landfill	1st and 3rd	Saginaw Bay
MID000724724	The Dow Chemical Co.	1st and 3rd	Saginaw Bay
MID000809632	Dow Corning Corp.	2nd	Saginaw Bay
MID000820381	Pfizer (formerly Pharmacia & Upjohn)	3rd	Kalamazoo
MID047153077	MDEQ (Prod. Plated Plastics.)	3rd	Kalamazoo
MID092947928	Drug & Laboratory Disposal, Inc.	2nd and 4th	Kalamazoo
MID005119748	Auto Specialties MFG Co	3rd	Kalamazoo
MI0571924760	US Dept/Defense	3rd	UP
MID990687964	Lake States Wood Preserving	3rd	UP
MID020263877	Erie Coatings & Chemicals Inc	3rd	Jackson
MID005044813	County of Lenawee (Buckeye Products Corp.)	3rd	Jackson
MID058723867	Henkel Surface Technologies	FY10 - 3rd	Jackson
MIR000001834	University of Michigan Beck Road	1st and 3rd	Jackson
MID005057005	ACH LLC (Visteon Ford Monroe Stamping)	3rd	Jackson
MID009305665	ACH LLC (Visteon Ford Saline)	FY10 - 1st	Jackson
MID990760100	Chrysler Corp. Introl Division	FY10 - 4th	Jackson
MID020906764	Detrex Chemical	FY10 - 4th	Gr Rapids
MID006026793	Access Business Gr LLC (formerly Amway)	4th	Gr Rapids
MID017079625	Delphi Automotive Systems	1st	Gr Rapids
MID006025217	Kurziel Iron of Rothbury, Inc.	FY10 - 3rd	Gr Rapids
MID006407597	General Dynamics Land Systems (Teledyne)	FY10 - 1st	Gr Rapids
MID006014666	Lacks Industries, Inc. - Cascade	FY10 - 2nd	Gr Rapids
MID080359433	Lacks Industries, Inc. - Saranac	FY10 - 2nd	Gr Rapids
MID006020895	KHI, Inc.	FY10 - 1st	Gr Rapids
MID072589328	MDEQ – RRD Fenske Landfill	FY10 - 1st	Gr Rapids
MID980995534	Michigan Environmental Recovery Inc	3rd	Gr Rapids
MID980499735	Perfect Circle Division of Dana Corp.	1st	Gr Rapids
MID006013643	Pfizer Global Manufacturing (Parke Davis)	4th	Gr Rapids

Site ID	Site Name for TSDF	Quarter(s)*	District
MID990858003	Organic Chemicals, Inc.	3rd	Gr Rapids
MID006014906	Occidental Chemical Corp.	2nd	Gr Rapids

\*Note: FY10 inspections are listed for tracking, projection, and planning purposes only. These inspections are not FY09 commitments. This reflects a complete list of the TSDF Universe and the schedule for inspections to be completed in FY09 as well as inspections that will not be completed in FY09 but will be inspected in FY10.

#### Hazardous Waste Section CME/Operation & Maintenance (O&M) Schedule

HWS staff will conduct the CME/O&M inspections as shown in the Compliance and Enforcement FY09 TSD Work Schedule, which follows this page.

# COMPLIANCE AND ENFORCEMENT FY09 TSD WORK SCHEDULE

9/16/2008

Hazardous Waste Section

Page 1 of 1

COMMITMENT / FACILITY	MET	DROPPED	MID
<b>Conduct Corrective Action Monitoring and Maintenance (CAMP) Inspection in Q1</b>			
1 FORD MOTOR CO ALLEN PK CLAY MINE LF			MID980568711 JR
2 REICHHOLD INC FERNDAL E MICHIGAN			MID020087128 JR
<b>Conduct Corrective Action Monitoring and Maintenance (CAMP) Inspection in Q3</b>			
3 KHI INC			MID006020895 JR
<b>Conduct Groundwater Operations &amp; Maintenance (O&amp;M) Inspection in Q2</b>			
4 DAIMLER CHRYSLER CORP INTROL DIV			MID990760100 JR
5 DOW CORNING MIDLAND PLT			MID000809632 JR
6 GRANGER GRAND RIVER LANDFILL			MID082771700 DB
<b>Conduct Groundwater Operations &amp; Maintenance (O&amp;M) Inspection in Q4</b>			
7 LACKS INDUSTRIES INC SARANAC			MID080359433 DB
8 PERMA FIX OF MICHIGAN INC			MID096963194 DS
9 THE DOW CHEMICAL COMPANY-SALZBURG LAND			MID980617435 AT
10 WAYNE DISPOSAL INC			MID048090633 JR
<b>Conduct Post Closure Cap Inspection in Q1</b>			
11 FORD MOTOR CO ALLEN PK CLAY MINE LF			MID980568711 JR
12 LAKE STATES WOOD PRESERVING			MID990687964 JR
13 REICHHOLD INC FERNDAL E MICHIGAN			MID020087128 JR
14 US AIR FORCE K I SAWYER AFB REAL PROPERTY			MI0571924760 JR
<b>Conduct Post Closure Cap Inspection in Q3</b>			
15 LACKS INDUSTRIES INC SARANAC			MID080359433 JR
16 MICHIGAN SEAMLESS TUBE			MID082767591 JR
17 WAYNE DISPOSAL INC			MID048090633 JR
<b>Conduct Post Closure Cap Inspection in Q4</b>			
18 AUTOMOTIVE COMPONENTS HOLDINGS LLC MO			MID005057005 JR
<b>Conduct Post Closure Cap Inspection in Q4 (Poseyville Landfill)</b>			
19 DOW CHEMICAL MAIN PLANT & INCINERATOR CO			MID000724724 JR
<b>Enforcement Technical Support</b>			
20 ENVIRONMENTAL DISPOSAL SYSTEMS			MIR000016055 RB

## Office of Criminal Investigations (OCI)

The OCI's activities in conjunction with the Work Plan are grouped into three areas of criminal investigation and enforcement:

- TSD Facilities
- Hazardous Waste Transporters
- Generators

The OCI and the WHMD will continue to analyze available facility data relating to imported solid wastes, liquid industrial wastes, and hazardous wastes. Compliance reviews will include an evaluation of shipper waste characterization documentation and solid waste disposal facility screening procedures. Each individual facility's compliance with Part 111 and Part 115, Solid Waste Management, of the NREPA, will be evaluated.

The OCI, in conjunction with the WHMD, will continue periodic border-crossing inspections targeting international waste haulers' importation and disposal activities. The OCI will strive to coordinate these efforts with the Ontario Ministry of the Environment for surveillance of hazardous waste movement across our common border. These efforts are designed to provide intelligence for future enforcement initiatives in concert with the Eastern and Western Michigan Environmental Crime Task Forces.

The OCI and the WHMD will continue to regularly communicate and work with the U.S. Customs to monitor waste shipments, identify violations and targets for enforcement actions, and prosecute violators.

The OCI and the WHMD will continue to examine existing waste data and knowledge bases for the purposes of providing for detection and targeting of potential noncompliant shippers for inspection. Uniform waste manifest databases, waste generation reports, TSD facility reports, manufacturing facility databases, and other objective factors will be analyzed to target users who have not paid significant user fees, delinquent financial assurance facilities, nonreporting sites, noncompliant shippers, unlicensed waste haulers, and manifests with discrepancies posing environmental harm (considering risk-based criteria), impacting on program integrity, and acting as a deterrent to future violations or violations by others.

### Activity Discussion

The OCI activities in conjunction with the Work Plan are grouped into three categories:

- 1) TSD Facilities: OCI officers will investigate violations at TSD facilities in conjunction with WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. In addition, the OCI may institute random patrols resulting in the inspection of waste hauling vehicles at TSD facilities and inspection of TSD records. Where warranted, the OCI will compile cases for referral to a county prosecutor or the Michigan Department of Attorney General (MDAG) for prosecution.
- 2) Hazardous Waste Transporters: The OCI will continue its program of inspecting waste transporters for compliance with hazardous waste transport and disposal

regulations. Waste hauling vehicle inspections will occur either as random events or as scheduled efforts carried out at major points of truck concentrations (e.g., Blue Water Bridge at Port Huron and major highway weigh stations). Scheduled events will be conducted in conjunction with U.S. Customs/Ontario officials and/or Michigan State Police, Traffic Safety Division, officers as appropriate.

To supplement the on-road vehicle inspection program, the OCI may audit waste transporter facility documents. Also, the OCI will work with the WHMD to determine whether existing data meet enforcement needs.

As an area of concentration, the OCI and the WHMD will work together to determine whether liquid industrial waste transporters are transporting properly characterized waste, i.e., not carrying hazardous wastes improperly characterized as liquid industrial waste.

- 3) Generators: The OCI will investigate generator/facility violations of suspected hazardous waste mismanagement or releases in conjunction with WHMD staff pursuant to a complaint or the findings of a WHMD staff inspection. Noncompliant generators may also be detected by OCI officers during transporter and TSD audits. Where warranted, the OCI will compile cases for referral to a county prosecutor or the MDAG for prosecution.

## **2.3 ADMINISTRATIVE CONTROLS**

### **Goals**

The U.S. EPA developed a RCRA Cleanup Baseline in conjunction with the states as a result of a mandate in the Government Performance and Results Act (GPRA) requiring the U.S. EPA to measure and track program progress. Because the U.S. EPA has set ambitious goals for 2020 that relate to these facilities, the group is called the GPRA 2020 Corrective Action (CA) Universe. In total, the GPRA 2020 CA Universe contains a wide variety of sites. Some facilities are heavily contaminated, while others were contaminated but have since been cleaned up. Still other facilities have not been fully investigated yet and may require little or no remediation.

### **Priority**

The cleanup of some of the facilities in the GPRA 2020 CA Universe is enforced via enforceable administrative controls, such as issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license.

There are 115 Michigan facilities in the GPRA 2020 CA Universe, and the MDEQ is the lead regulatory agency for corrective action at 87 of the facilities.

Of the 115 Michigan facilities in the GPRA 2020 CA Universe, there are 60 facilities that are subject to enforceable administrative controls by issuance of an operating license, postclosure operating license, or an approved postclosure plan equivalent to a postclosure operating license. This subset of the GPRA 2020 CA Universe is referred to as the GPRA 2020 Permit Baseline.

With respect to the permitting program, the *FY2009 National Program Manager's Guidance, April 2008, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, goal statement is:

During FY 2009, Regions should work with the states towards achieving the FY 2011 national strategic target...by implementing initial approved controls or updated controls. This should result in getting at least 98% of the facilities on the permitting baseline under approved controls, and updating controls at additional facilities, ....

### **GPRA 2020 Permit Baseline by Facility**

The GPRA 2020 Permit Baseline by Facility Table shows the actual and projected accomplishment dates for each MDEQ-lead facility, alphabetically. An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

The GPRA 2020 Permit Baseline by Facility Table follows this page.

### **Strategy**

The MDEQ strategy is to issue or reissue operating licenses and postclosure operating licenses and approve postclosure plans at a pace that will ensure that these administrative controls are maintained for 98 percent of the 60 facilities in the GPRA 2020 Permit Baseline.

The national goal is to have achieved 98 percent of the GPRA 2020 Permit Baseline facilities with "controls in place" by September 30, 2011 (FY11). The MDEQ expects to achieve the national goal of 98 percent.

### **Objective**

The objective of the administrative controls is to implement the described strategy to issue operating licenses and postclosure operating licenses, approve closure plans and postclosure plans, and apply other administrative mechanisms such that the GPRA "approved controls in place" goals by FY11 will be achieved for 98 percent of the GPRA 2020 Permit Baseline.

### **Considerations**

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA and other MDEQ divisions to achieve the "controls in place" schedules. Successfully implementing these schedules will allow the MDEQ to meet the FY09 national goals for the "approved controls in place" GPRA 2020 Permit Baseline facilities.

### **Scheduled Activities: Hazardous Waste Section**

#### **Hazardous Waste TSD Facilities Administrative Controls Work Schedule**

The Administrative Controls FY09 TSD Work Schedule follows the GPRA 2020 Permit Baseline by Facility Table.



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# GPRA 2020 PERMIT BASELINE BY FACILITY

For the GPRA Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

		OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
1	ACCESS BUSINESS GROUP	MID 006 026 793	4/14/2000 4/14/2010	
2	AMPCO PITTSBURGH CORP	MID 004 508 628	8/21/1996	8/21/1996
3	ANCHOR LAMINA AMERICA	MID 006 017 966		7/21/1998
4	AUTOMOTIVE COMPONENT	MID 005 057 005	11/28/2007	3/27/2000
5	AUTOMOTIVE COMPONENT	MID 009 305 665		
6	BAYER CROSCIENCE LP	MID 080 358 351		
7	CHEMICAL ANALYTICS INC	MID 985 568 021	9/30/2002 9/30/2012	12/30/2003
8	CHRYSLER CORP	MID 990 760 100	9/30/2003	
9	CYTEC INDUSTRIES INC	MID 005 360 680		5/11/1999
10	DANA CORPORATION	MID 980 499 735	5/30/2002	
11	DELPHI AUTOMOTIVE SYST	MID 017 079 825	9/30/2005	2/1/1991
12	DELPHI AUTOMOTIVE SYST	MID 005 356 847	1/21/2005	
13	DETREX CORP	MID 091 605 972	1/31/2001 1/31/2011	3/24/1997
14	DETROIT STEEL COMPANY	MID 017 422 304		9/1/1998
15	DOW CORNING CORPORAT	MID 000 809 632	9/29/2000 9/29/2010	
16	DRUG AND LABORATORY D	MID 092 947 928	11/15/1999 12/30/2009	4/5/1996
17	DYNECOL INC	MID 074 259 565	9/6/2007 3/31/2009	
18	EDWARDS OIL SERVICE IN	MID 088 754 668		8/15/2003
19	ENTHONE OMI INC	MID 056 717 747		11/14/2001
20	EQ - THE ENVIRONMENTAL	MID 000 724 831	10/31/2007 10/31/2017	9/2/1999
21	EQ DETROIT INC	MID 980 991 566	12/12/2003 9/30/2010	
22	EQ RESOURCE RECOVERY	MID 060 975 844	9/12/2003 9/13/2013	
23	FORD MOTOR COMPANY	MID 980 568 711	9/30/2004	
24	GAGE PRODUCTS CO	MID 005 338 801	8/4/2003 8/4/2013	
25	GENERAL MOTORS CORPO	MID 050 615 996	12/5/2001 12/5/2011	
26	GENERAL MOTORS CORPO	MID 005 356 860	6/26/2006	3/24/2005

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
 PCP ISSUE / PROJ : post closure plan issuance or projected issuance date  
 CC ACCEPTED / PROJ : clean closure accepted or projected acceptance date  
 DATE: date of administrative control in place

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GPRA 2020 PERMIT BASELINE BY FACILITY

For the GPRA Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

	OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
27	GENERAL MOTORS CORPO	MID 005 358 951	3/31/1992
28	GRAND BLANC LANDFILL	MID 980 506 285	
29	GRANGER LAND DEVELOP	MID 082 771 700	9/30/1999
30	GREDE FOUNDRIES INC	MID 005 513 262	
31	HADLEY INDUSTRIES	MID 982 222 242	
32	HOLCIM US INC	MID 005 038 500	
33	KHI INC	MID 006 020 895	
34	KURDZIEL IRON OF ROTHB	MID 006 025 217	
35	LACKS INDUSTRIES INC	MID 006 014 666	
36	LACKS INDUSTRIES INC	MID 080 359 433	
37	LAFARGE MIDWEST INC	MID 005 379 607	
38	LAKE STATES WOOD PRES	MID 990 687 964	
39	LE PETOMANE VII CUSTODI	MID 098 011 992	
40	MACDERMID INC	MID 005 338 371	
41	MI DEPT/NATURAL RESOUR	MID 980 825 632	
42	MICHIGAN REUTILIZATION L	MID 005 358 130	
43	MICHIGAN SEAMLESS TUBE	MID 082 767 591	
44	MICHIGAN STATE UNIVERSI	MID 053 343 976	
45	NATIONAL STANDARD COM	MIT 270 010 549	
46	OCCIDENTAL CHEMICAL CO	MID 006 014 906	
47	PEPIN IRECO INC	MID 041 413 154	
48	PERMA FIX OF MICHIGAN IN	MID 096 963 194	
49	PETRO-CHEM PROCESSING	MID 980 615 298	
50	PFIZER INC PARKE-DAVIS &	MID 006 013 643	
51	PHARMACIA & UPJOHN CO	MID 000 820 381	
52	RUGGED LINER INC	MID 058 816 927	

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
 PCP ISSUE / PROJ : post closure plan issuance or projected issuance date  
 CC ACCEPTED / PROJ : clean closure accepted or projected acceptance date  
 DATE: date of administrative control in place

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# GPRA 2020 PERMIT BASELINE BY FACILITY

For the GPRA Permit Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically, and the resulting cumulative percentage of the baseline met. See footnote for examples of approved controls in place. National Goals: 98% of facilities have approved controls in place by 2011 and renew permits/post closure permits/approved post closure plans/clean closure to maintain 98% Controls in Place by 2011.

		OP LIC ISSUE / PROJ	PCP ISSUE / PROJ	CC ACCEPTED / PROJ
53	SAFETY KLEEN SYSTEMS I	MID 000 722 686		1/20/1999
54	SOLUTIA INC	MID 009 708 678	3/27/2002	
55	SYSTECH ENVIRONMENTAL	MID 981 200 835		9/21/2001
56	THE DOW CHEMICAL COMP	MID 980 617 435	12/23/1986	
57	THE DOW CHEMICAL COMP	MID 000 724 724	6/12/2003	6/12/2013
58	UNIVERSITY OF MICHIGAN	MIR 000 001 834	7/16/1999	7/16/2009
59	WAYNE DISPOSAL INC	MID 048 080 633	7/13/2001	3/31/2009
60	WOODLAND MEADOWS LA	MID 000 810 408	9/12/2005	

OP LIC ISSUE / PROJ : operating license issuance or projected issuance date  
 PCP ISSUE / PROJ : post closure plan issuance or projected issuance date  
 CC ACCEPTED / PROJ : clean closure accepted or projected acceptance date  
 DATE: date of administrative control in place

# ADMINISTRATIVE CONTROLS FY09 TSD WORK SCHEDULE

8/13/2008

Hazardous Waste Section

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## COMMITMENT / FACILITY

MET DROPPED

MID

### Construction Permit Application Completeness Review

1 DRUG AND LABORATORY DISPOSAL INC

MID092947928

KT

### License Application Call In (if necessary:mixed waste)

2 BECK ROAD FACILITY

MIR000001834

RB

### License Application Completeness Review

3 DRUG AND LABORATORY DISPOSAL INC

MID092947928

KT

4 EQ DETROIT INC

MID980991566

RC

5 GRANGER GRAND RIVER LANDFILL

MID082771700

PQ

6 PETRO-CHEM PROCESSING GROUP OF NORTRU

MID980615298

DD

### License Application Technical Review

7 LIMITED STORAGE FACILITY

MIK644147266

DD

### License Reissuance Determination

8 THE DOW CHEMICAL COMPANY-SALZBURG LAND

MID980617435

CH

### License Reissuance Determination (FY08 carryover)

9 DYNECOL INC

MID074259565

RC

10 WAYNE DISPOSAL INC

MID048090633

PQ

### Post Closure Plan Approval Determination (FY08 carryover)

11 KURDZIEL IRON OF ROTHBURY INC

MID006025217

PQ

## **2.4 CORRECTIVE ACTION**

### **Goals**

With respect to the corrective action program for the GPRA 2020 CA Universe for FY09, the *FY2009 National Program Manager's Guidance, April 2008, Office of Solid Waste and Emergency Response, U.S. Environmental Protection Agency*, goal statements are:

- By 2011, control all identified unacceptable human exposures from site contamination to health-based levels for current land and/or groundwater use conditions at 95% of all high-National Corrective Action Prioritization System (NCAPS)-ranked sites on the 2020 Corrective Action Universe.
- By 2011, control the migration of contaminated groundwater at 80% of all high-NCAPS sites on the 2020 Corrective Action Universe.
- By 2011, complete construction of final remedies at 22% of the entire 2020 Corrective Action Universe.

### **Priority: GPRA 2020 CA Universe**

There are 115 Michigan facilities in the GPRA 2020 CA Universe, and the MDEQ is the lead regulatory agency for corrective action at 87 of the facilities. Of these 87 facilities, 40 are high National Correction Action Priority System (NCAPS).

### **GPRA 2020 CA Universe MDEQ-Lead Facility**

The GPRA 2020 CA Universe MDEQ-Lead by Facility Table shows the actual and projected accomplishment dates for each facility, alphabetically, for each of the three corrective action goals stated above.

An explanation of the abbreviated column headings is shown at the bottom of each page of the table.

The GPRA 2020 CA Universe MDEQ-Lead by Facility Table follows this page.

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**GPRA 2020 CORRECTIVE ACTION UNIVERSE**  
**MDEQ LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

						NCAPS		EXP CONTROL /		GW CONTROL /		CONSTRUCT / PROJ	
						NCAPS		PROJ		PROJ		PROJ	
1	5200 East Cork St Investors	KALAMAZOO	MID 001 876 663	M									
2	Access Business Group Llc	ADA	MID 006 026 793	H				9/30/2002		8/20/2004		9/30/2008	
3	Bayer Cropscience Lp	MUSKEGON	MID 080 358 351	H				9/14/2005		9/23/2004		1/1/2021	
4	Black River Public School	HOLLAND	MID 006 411 953	L				9/21/2006		9/16/2003		9/30/2009	
5	Blue Cow Inc	MIDDLEVILLE	MID 060 197 662	H				1/16/1998		1/16/1998		1/16/1998	
6	Bostik Findley Inc	MARSHALL	MID 060 198 249	M									
7	Central Products Co	MARYSVILLE	MID 061 862 926	L									
8	Chemical Analytics Inc	ROMULUS	MID 985 568 021					8/4/1998		8/4/1998			
9	Chrysler Corp Introl Div	DEXTER	MID 990 760 100	M				9/28/2006		8/14/2007		9/30/2010	
10	Container Specialties Inc	FLINT	MID 005 361 597	H					9/30/2008				
11	Cytec Industries Inc	KALAMAZOO	MID 005 360 680	L					9/30/2008		9/30/2008		9/30/2010
12	Dana Corporation	MUSKEGON HE	MID 980 499 735	H				10/3/2002		8/28/2002		9/30/2010	
13	Delphi Automotive Systems L	FLINT	MID 980 568 620	L									
14	Delphi Automotive Systems L	SAGINAW	MID 005 356 845	L									
15	Detd, Llc	PLYMOUTH	MID 004 508 628	H				2/18/1996		2/18/1996		8/29/2003	
16	Detrex Corporation	DETROIT	MID 091 605 972	H						2/10/2006			
17	Detroit Coke Corp	DETROIT	MID 099 114 704	M				9/25/2003					
18	Dore Industrial Inc	BAY CITY	MID 005 359 286	H				9/21/2006		8/3/2006		9/30/1999	
19	Dow Corning	MIDLAND	MID 000 809 632	H				9/24/1999		9/24/1999			
20	Drug And Laboratory Disposa	PLAINWELL	MID 092 947 928	M				3/27/1996		3/27/1996			
21	Dsc Ltd Trenton Plant	TRENTON	MID 017 422 304	M					9/30/2010		9/30/2010		9/30/2010
22	Du Pont E I De Nemours Co	MONTAGUE	MID 000 809 640	M									
23	Dynacol Inc	DETROIT	MID 074 259 565	L				3/16/1998		3/16/1998			
24	Ei Dupont Flint Site	FLINT	MID 005 512 066	L				9/21/2006		1/30/2006		9/30/2008	
25	Enthone Omi Inc	WARREN	MID 056 717 747	L									
26	Eq Detroit Inc	DETROIT	MID 980 991 566	L									
27	Eq Resource Recovery Inc	ROMULUS	MID 060 975 844	H				9/24/1999		8/23/1996			
28	Federal-Mogul Corp	GREENVILLE	MID 006 021 414	H					9/30/2008	9/24/1999			

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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**GPRA 2020 CORRECTIVE ACTION UNIVERSE**  
**MDEQ LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

			NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
29	Fenske Landfill	GRAND RAPID	MID 072 589 328	H		
30	Ford Motor Co Allen Pk Clay	ALLEN PARK	MID 980 568 711	M	1/4/2007	9/30/2004
31	Ford Motor Co Mt Clemens Pl	MOUNT CLEME	MID 076 342 708	M		
32	Former Lake States Wood Pr	MUNISING	MID 990 687 964	M		
33	Gage Products Co	FERNDAL	MID 005 338 801	L		
34	General Motors Corporation	BAY CITY	MID 005 356 688	H	9/30/2008	9/30/2010
35	General Motors Corporation	FLINT	MID 005 356 860	H	5/29/1998	5/29/1998
36	General Motors Corporation	YPSILANTI	MID 980 587 893	L		
37	General Motors Corporation	WARREN	MID 050 615 996	L		
38	General Motors Corporation	SAGINAW	MID 005 356 696	M	9/30/2008	9/15/2006
39	Grand Blanc Landfill	GRAND BLANC	MID 980 506 265	M		
40	Granger Land Development	GRAND LEDGE	MID 082 771 700	H	9/5/2001	9/30/2008
41	Grede Foundries Inc	VASSAR	MID 005 513 262	M		
42	Hadley Industries Div Of Asi	LUDINGTON	MID 982 222 242			
43	Heico Holdings Lic	NILES	MIT 270 010 549	M		
44	Holcim Us Inc	DUNDEE	MID 005 038 500	M		
45	Honeywell International	MUSKEGON	MID 072 575 731	H	9/30/2008	
46	Khi Inc	HOLLAND	MID 006 020 895	H	1/16/2001	1/16/2001
47	Kurziel Iron Of Rothbury, Inc	ROTHBURY	MID 006 025 217	H	9/1/1990	
48	Lacks Industries Inc	GRAND RAPID	MID 006 014 666	H	9/30/2010	1/1/2021
49	Lafarge North America	ALPENA	MID 005 379 607	M	5/17/2001	5/17/2001
50	Le Petomane Vii Custodial Tr	DETROIT	MID 098 011 992	H		
51	Lobdell Emery Corporation D	ALMA	MID 005 378 112	M		
52	Macdermid Inc	FERNDAL	MID 005 338 371	M		
53	Mi Dept/Natural Resources	ROSCOMMON	MID 980 825 632	H	9/29/2000	2/1/2002
54	Michigan Disposal Waste Tre	BELLEVILLE	MID 000 724 831	H	9/30/2009	9/30/2009
55	Michigan Seamless Tube Lic	SOUTH LYON	MID 082 767 591	H	9/30/2005	
56	Michigan State University	EAST LANSING	MID 053 343 976	H	5/29/1998	2/18/1993

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750) NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank

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**GPRA 2020 CORRECTIVE ACTION UNIVERSE**  
**MDEQ LEAD BY FACILITY**

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

		NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
57	Modineer	MID 367 427 523			
58	National Standard Niles City	MID 005 069 257	9/29/2003	9/22/2004	
59	Pepin Iresco Inc	MID 041 413 154		9/30/2008	
60	Perma Fix Of Michigan Inc	MID 096 963 194	3/24/2004	9/24/2003	9/30/2010
61	Petro Chem	MID 980 615 298	6/16/1999	6/16/1999	
62	Pfizer Inc Parke-Davis & Co	MID 006 013 643	11/13/2003	9/21/2004	9/30/2010
63	Pharmacia & Upjohn Compan	MID 000 820 381	3/29/2001	3/29/2001	3/30/2001
64	Ppg Industries Inc	MID 048 788 749		9/30/2008	9/30/2010
65	Production Plated Plastics In	MID 047 153 077	7/14/2000	6/12/2001	
66	Reichhold Inc	MID 020 087 128	5/28/1998	4/24/1998	
67	Rouge Steel Co	MID 087 738 431	2/8/2005	2/8/2005	9/30/2010
68	Rugged Liner Inc	MID 058 816 927	8/25/2006	8/4/2006	9/30/2008
69	Safety Klean Systems Inc	MID 981 000 359	5/28/1998	5/28/1998	4/25/1996
70	Safety Klean Systems Inc	MID 000 722 686		7/18/1998	
71	Selfridge Air National Guard	MID 099 113 128	9/29/2004		9/30/2020
72	Solutia Inc	MID 009 708 678			
73	Systech Environmental Corp	MID 981 200 835			
74	Teledyne Vehide Systems	MID 006 407 597	7/7/2005	7/7/2005	9/30/2010
75	Textron Automotive Function	MID 006 030 357			
76	The Dow Chemical Company	MID 980 617 435		9/30/2009	9/30/2009
77	The Dow Chemical Company	MID 000 724 724		9/30/2003	
78	Tpi Petroleum Inc	MID 005 358 130	9/27/2004	9/16/2004	9/30/2010
79	Transign Inc	MID 006 007 967		9/30/2008	9/30/2009
80	Triton Petroleum Lic	MID 088 754 668	7/2/1992	11/22/1993	
81	University Of Michigan	MIR 000 001 834	9/21/2006	7/11/2005	10/20/2004
82	Visteon Corporation	MID 005 057 005	10/1/2001	3/25/2005	
83	Visteon Corporation Saline Pl	MID 009 305 665			
84	Wacker Chemical Corp	MID 075 400 671	9/27/2007	9/14/2007	9/30/2010

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)

GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750) NCAPS: National Corrective Action Prioritization System

H=High M=Medium L=Low rank



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GPRA 2020 CORRECTIVE ACTION UNIVERSE  
MDEQ LEAD BY FACILITY

For the GPRA 2020 Corrective Action Baseline, shows the actual and projected accomplishment dates for each facility, alphabetically. See footnote for examples of approved controls in place. National Goals By 2011: 1) 95% of High-NCAPS ranked sites on baseline with Human Exposures Controlled; 2) 80% of High-NCAPS ranked sites on baseline with Groundwater Controlled; 3) 22% of all sites on baseline with Construction Complete.

			NCAPS	EXP CONTROL / PROJ	GW CONTROL / PROJ	CONSTRUCT / PROJ
85	Wayne Disposal Inc	BELLEVILLE	MID 048 090 633 M	9/30/2009	9/30/2009	
86	Whirlpool Corp	SAINT JOSEPH	MID 005 477 773 H	2/27/2001	2/27/2001	12/27/2002
87	Woodland Meadows Ldfl Nort	CANTON	MID 000 810 408 L			9/30/2009

EXP CONTROL / PROJ : Humand exposures control date/ projected date (CA725)  
GW CONTROL / PROJ: Groundwater controlled date or projected control date (CA 750)

CONSTRUCT / PROJ: Construction complete date or projected completion date (CA550)  
NCAPS: National Corrective Action Prioritization System  
H=High M=Medium L=Low rank

### Environmental Indicators (EIs)

The RCRA CA Program now tracks EIs as the means by which environmental results are measured. Of the 3 milestones listed for FY09, the first two are environmental indicator milestones because they are meant to "indicate" environmental quality at the site.

The RCRA CA EIs are a means of evaluating and reporting on the acceptability of current site conditions (i.e., they are interim milestones and not final remedy or site closure milestones). EIs provide an opportunity for facilities and regulators to show meaningful progress that is achievable in the near future. They are a high priority within the U.S. EPA and the highest priority under the RCRA CA Program. EIs are site-wide determinations; the facility cannot achieve the EI until all aspects of the facility subject to RCRA CA are considered in the determination. EIs measure the effectiveness of stabilization actions. Stabilization of these sites is the MDEQ's first priority with limited resources. These EIs focus on results (i.e., changes in the quality of the environment) and deemphasize the CA process. The EIs reflect "current" conditions (i.e., known or expected at the time of the determination). EIs are site-wide and should reflect all contaminants of concern present above risk-based levels of concern.

- The Current Human Exposures Under Control (CA725) EI is an assessment of actual current human risks and would typically take the form of a qualitative assessment of the completeness of exposure pathways but, as necessary, may include a traditional Quantitative Risk Assessment.
- The Groundwater Migration Under Control (CA750) EI is strictly a resource protection measure and not a direct measure of human risk. It may include the assessment of impacts of groundwater discharges to surface waters and surface water ecosystems.

### Corrective Action Completion Progress

The U.S. EPA will use one administrative milestone in FY09 to track the progress of the GPRA 2020 CA Universe facilities. That milestone is reported in the national RCRA database (RCRAInfo) using the following data element:

- Date of Certification of Remedy Completion or Construction Completion (CA550): The date on which the MDEQ or the U.S. EPA formally notifies the RCRA facility that they accept its certification that the remedy specifications in the permit/order have been met and that the specified remedy(ies) has been completed, and/or only operation and maintenance requirements remain in order to maintain this level of performance. The "actual date" is the date the Director of the MDEQ signs the final order, permit, or written acknowledgement. The "projected date" is the date the Director of the MDEQ is expected to sign the final order, permit, or written acknowledgement.

### **Strategy**

The MDEQ strategy during FY09 is to apply available resources at a pace that will enable the meeting of the following milestones for the GPRA 2020 CA Universe facilities by FY11:

- Human exposure controlled milestone at 95 percent of the high NCAPS-ranked sites;
- Contaminated groundwater controlled at 80 percent of all high-NCAPS-ranked sites;
- Complete construction of final remedies at 22 percent of the entire GPRA 2020 CA Universe.

### **Objective**

The objective of the RCRA CA Program is to implement the strategy described to conduct correction action at the GPRA 2020 CA Universe facilities for which the MDEQ is the lead regulatory agency such that the MDEQ will achieve the U.S. EPA GPRA permitting and corrective action goals by FY11.

### **Considerations**

The MDEQ will apply resources as well as allocate the work to be done between the U.S. EPA and other MDEQ divisions to allow the MDEQ to meet the FY11 national goals for the GPRA 2020 CA Universe facilities.

### **Scheduled Activities: Hazardous Waste Section**

#### Hazardous Waste TSD Facilities Corrective Action Work Schedule.

Following this page is the Corrective Action FY09 TSD Work Schedule.

#### Corrective Action Monitoring and Maintenance (Camm) Corrective Action Efforts

Recognizing the continued GPRA progress on corrective actions "completed with controls," the MDEQ has identified to the U.S. EPA a very important need for long-term CAMM inspections. These inspections are to ensure that the approved institutional and engineering controls are being properly operated, maintained, and transferred (if property transactions occur) and are indeed effective. During FY07 a pilot inspection process was developed. These pilot inspections to evaluate corrective action compliance continued in FY08 so a more finalized inspection format and proposed inspection rotation schedule could be planned, approved, and initiated for FY09. The CAMMs are also included in the Corrective Action FY09 TSD Work Schedule.

# CORRECTIVE ACTION FY09 TSD WORK SCHEDULE

8/13/2008

Hazardous Waste Section

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**COMMITMENT / FACILITY**

**MET DROPPED**

**MID**

**Corrective Action Oversight**

1 ACCESS BUSINESS GROUP LLC	MID006026793	PQ
2 ADVANCED RESOURCE RECOVERY LLC	MID057002602	JR
3 ALMA FACILITY	MID005358130	PQ
4 AUTOMOTIVE COMPONENTS HOLDINGS LLC MO	MID005057005	PQ
5 AUTOMOTIVE COMPONENTS HOLDINGS LLC SALI	MID009305665	PQ
6 BASF CORP	MID064197742	RC
7 CYTEC INDUSTRIES INC	MID005360680	DD
8 DETREX CORPORATION SITE A	MID091605972	DD
9 DSC LTD TRENTON PLANT-SITE A	MID017422304	RC
10 E I DU PONT DE NEMOURS-MONTAGUE WORKS	MID000809640	RB
11 E I DUPONT DE NEMOURS	MID005512066	DD
12 EQ RESOURCE RECOVERY INC	MID060975844	PQ
13 MICHIGAN SEAMLESS TUBE	MID082767591	RB
14 NATIONAL STANDARD NILES CITY COMPLEX	MID005069257	KT
15 PERFECT CIRCLE DIVISION	MID980499735	DD
16 PERMA FIX OF MICHIGAN INC	MID098963194	KT
17 PFIZER GLOBAL MANUFACTURING HOLLAND PLA	MID006013643	CH
18 REALM/COLDWATER ROAD LANDFILL	MID005356860	RC
19 SELFRIDGE AIR NATIONAL GUARD	MID099113128	PQ
20 SEVERSTAL NORTH AMERICA INC	MID087738431	KT
21 TRICIL ENVIRONMENTAL SERVICES	MID072585755	KT

**Corrective Action Oversight - Off Site**

22 DOW CHEMICAL MAIN PLANT & INCINERATOR CO	MID000724724	CH
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**Corrective Action Oversight - On Site**

23 DOW CHEMICAL MAIN PLANT & INCINERATOR CO	MID000724724	CH
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**GPRA CA400 Remedy Select Determination**

24 GRANGER GRAND RIVER LANDFILL	MID082771700	PQ
25 REICHOLD INC FERNDAL MICHIGAN	MID020087128	DD
26 WHIRLPOOL CORP ST JOSEPH DIV PLTS 3-6	MID005477773	KT

**GPRA CA400 Remedy Select Determination (FY08 carryover)**

27 BAYER CROPSOURCE LP	MID080358351	RC
28 DAIMLER CHRYSLER CORP INTROL DIV	MID990760100	JR

**GPRA CA550 Construction Complete Determination**

29 BLACK RIVER PUBLIC SCHOOL	MID006411953	RB
30 TRANSIGN INC	MID006007967	DD
31 WOODLAND MEADOWS LDFL NORTH	MID000810408	PQ

**GPRA CA725 Human Exposures Controlled Determination**

32 MICHIGAN DISPOSAL WASTE TREATMENT PLANT	MID000724831	KT
33 THE DOW CHEMICAL COMPANY-SALZBURG LAND	MID980617435	CH
34 WAYNE DISPOSAL INC	MID048090633	PQ

**GPRA CA750 Groundwater Controlled Determination**

35 MICHIGAN DISPOSAL WASTE TREATMENT PLANT	MID000724831	KT
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**CORRECTIVE ACTION  
FY09 TSD WORK SCHEDULE**

8/13/2008

Hazardous Waste Section

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**COMMITMENT / FACILITY**

**MET DROPPED**

**MID**

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**GPRA CA750 Groundwater Controlled Determination**

36 THE DOW CHEMICAL COMPANY-SALZBURG LAND

MID980617435

CH

37 WAYNE DISPOSAL INC

MID048090633

PQ

**GPRA CA750 Groundwater Controlled Progress (FY08 carryover)**

38 LACKS INDUSTRIES INC

MID006014666

CH

**GPRA CA999 Corrective Action Complete Determination**

39 RUGGED LINER INC

MID058816927

RC

## **2.5 STATE AUTHORIZATION**

### **Goal**

The U.S. EPA is committed to authorizing state programs and enhancing the U.S. EPA/MDEQ partnership.

### **Priorities**

Focus identifying opportunities to streamline the authorization process.

### **Strategy**

The MDEQ will continue to obtain and maintain the legal authorities necessary to administer a quality state program and conduct the regulatory activities required by RCRA.

The MDEQ will focus on continuing to pursue authorization for recently promulgated administrative rules that address, in part, the balance of RCRA Cluster 14 and all of RCRA Clusters 15, 16, and 17, along with several state-initiated revisions.

### **Objective**

Obtain and maintain adequate legal authorities to conduct regulatory activities required by RCRA.

### Considerations

- 1) Status of authorization activities indicated in the Work Plan.
- 2) Effectiveness of communication with the U.S. EPA concerning authorization activities, including timeliness and sufficiency of responses to U.S. EPA comments.

### **Scheduled Activities**

#### Program Revisions

The MDEQ will focus on continuing to pursue authorization as stated above for the recently promulgated administrative rules.

### ***Authorization Activities Schedule and Review Responsibilities***

<b>Event</b>	<b>Party</b>	<b>Time Frame</b>
Open public comment period on rules package	MDEQ	Will depend on if and when new rules are promulgated after RCRA Cluster 17
Provide the U.S. EPA with copy of public notice announcing public hearing on the rules package	MDEQ	No later than the time notice is provided to public
Provide the U.S. EPA with a copy of the effective rules	MDEQ	Within 30 days of effective date of rules
Provide the U.S. EPA with a draft express authorization revision application (ARA)	MDEQ	Within 30 days of effective date of rules

Event	Party	Time Frame
Provide the state with written comments on the draft express ARA	U.S. EPA	Within 60 days of receipt of draft express ARA
Provide the U.S. EPA with written response to comments on draft express ARA and submit final express ARA	MDEQ	Within 60 days of receipt of comments
Provide the state with written comments on final express ARA	U.S. EPA	Within 60 days of receipt of final express ARA
Provide the U.S. EPA with a written response to comments on final express ARA	MDEQ	Within 60 days of receipt of comments

#### Authorization Activities Schedule Adjustment

If a grant commitment will not be met, the MDEQ will take the following actions prior to that commitment date, except as noted otherwise:

- For delays of 30 days or less, provide verbal notification to the U.S. EPA Regulatory Specialist.
- For delays of more than 30 days, provide a written submittal to the U.S. EPA Regulatory Specialist that explains the reasons for the delay and includes a revised authorization activities schedule.

If the U.S. EPA requires time beyond the time frames outlined above to review submittals and the resulting delay impacts future grant commitments, the U.S. EPA will take the following actions:

- For delays that will impact commitments by 30 days or less, provide verbal notification to the MDEQ.
- For delays that will impact commitments by more than 30 days, provide a written submittal to the MDEQ that explains the reasons for the delay and includes a revised authorization activities schedule.

In such cases, the MDEQ will not be required to submit formal authorization activities schedule extension requests.

#### Report on Authorized State Program Revisions (RASPR)

The MDEQ will submit a RASPR by January 15, 2009. The RASPR will include: the Federal Register (FR) title, date, and citation; the federal statutory basis for the revision; the associated RCRA cluster number; the associated RCRA revision checklist number; the date by which program revisions are required; the date appearing on the rules package; the effective date of the rules; the amendment number associated with the rules package in relation to the base program; the authorization FR citation and date;

the date of authorization; a comments field; the codification FR citation and date; and the codification date.

## **2.6 WASTE MINIMIZATION**

To protect the Michigan environment, pollution prevention (P2) is a key element. The ESSD administers Section 11108 of Part 111, which established the state Waste Reduction Fee. Fees are assessed on businesses according to quantities of hazardous waste disposed at Michigan TSD facilities. Fees collected must be used for activities specified in Part 143, Waste Minimization, and Part 145, Waste Reduction Assistance, of the NREPA.

Parts 143 and 145 contain the following major components:

- Provide P2 assistance including information, technical, and financial assistance to help businesses, institutions, and communities;
- Application of P2 multimedia compliance assistance to encourage businesses, municipalities, and the public to meet environmental responsibilities in a cost-effective manner;
- Identification of opportunities to encourage P2 through traditional regulatory activities including permit programs, environmental impact statements, inspections, and enforcement; and
- Collection, analysis, and dissemination to the public of information received under Section 313 of Subtitle B of the Emergency Planning and Community Right-to-Know Act of 1986, Title III of the Superfund Amendments and Reauthorization Act of 1986, Public Law 99-499, 42 U.S.C. 11023.

The ESSD continues to focus on voluntary P2 programs as specified in the ESSD strategic plan. The strategic plan for FY09 has not yet been developed, but the ESSD expects there will be new program areas based on new MDEQ objectives. The ESSD priorities will be shifting to climate change issues and the development of a green chemistry program.

For further information about the ESSD P2 program, the P2 Annual Report is located on the Internet at [http://www.michigan.gov/documents/deq/deq-ess-p2-anlrpt-2007\\_225300\\_7.pdf](http://www.michigan.gov/documents/deq/deq-ess-p2-anlrpt-2007_225300_7.pdf), and the general P2 Web site is located at <http://www.michigan.gov/deq/0,1607,7-135-3585---,00.html>.

## **2.7 MISCELLANEOUS ACTIVITIES**

### Senior Environmental Employee Program (SEEP) Employees

The MDEQ is seeking \$270,000 in U.S. EPA-In Kind Funding for eight SEEP FTEs. The employees will continue to work in the following areas: (1) RCRAInfo System, (2) manifest and transporter licensing, (3) RCRAInfo/groundwater data entry, and (4) district inspections and assistance with computer programs and biennial report program. One SEEP employee will continue to be used by the districts to conduct certain inspections.

### Hazardous Waste Database Integration Project



The MDEQ will continue to maintain functionality in the WDS database, as well as to finance additional projects that will facilitate data translation to the U.S. EPA and increase data entry efficiency. These activities will be accomplished via a contract.

#### Computer Upgrades

The MDEQ intends to provide additional upgrades to the WHMD computers to meet the MDEQ standards and to purchase printers, updated software, and other equipment to meet operational needs.

#### Dioxin Sampling Contract

The MDEQ intends to continue to investigate dioxin/furan and coplanar polychlorinated bipheyl (PCB) contamination in the city of Midland, the Tittabawassee River, the Saginaw River, and Saginaw Bay. In addition, the MDEQ intends to continue with the MDEQ/Dow Tri-Cities Community Involvement process.

## **2.8 MANAGEMENT AND REPORTING**

### **Objective**

Manage the program to meet its overall purposes efficiently and effectively in light of resources and constraints.

### **Considerations**

- Accuracy and adequacy of the MDEQ program description contained in the Work Plan.
- Timeliness and accuracy of reports and other information submitted to the U.S. EPA.
- Effect of internal procedures to identify, track, and complete tasks necessary to fulfill the Work Plan.
- Effect of the MDEQ administrative records to support compliance and enforcement monitoring, permitting and closure, corrective action activities, and state authorization.
- Effectiveness of communications with the U.S. EPA relating to management and reporting issues.
- Quality of the staff training program.
- Quality of laboratory support.
- Quality of the MDEQ's responses to requests for information by the public.

### **Scheduled Activities**

In keeping with the RCRA State Oversight Quality Assessment Team Recommendations Report (QAT Report), September 1994, the MDEQ will follow the baseline oversight reporting requirements, as specified in Attachment 1 of the QAT Report and summarized in the following table:

## Baseline Oversight Reporting

### Reports/Reporting

WDS/RCRAInfo (CME, CA)  
Financial Reporting  
Equipment Inventory  
Report of Staff Vacancies  
Initiatives Report  
RASPR  
Import  
Training  
Expanded Public Participation  
Waste Minimization  
Hard Copy  
    Inspections of elements  
    State does not enforce  
    Commercial (off-site)  
    Draft and final licenses

### Frequency

Monthly  
Annually at end of year  
Annually at end of year  
Annually at end of year  
Semiannually  
Semiannually  
Semiannually  
Annually  
Optional  
Semiannually  
  
Per occurrence  
24-hour report; inspection report to follow  
As issued, in accordance with  
Memorandum of Understanding

Joint Inspections

Up to ten per year

Conference Calls  
Enforcement  
Permits and Closure  
Corrective Action  
WDS

Quarterly or as negotiated  
Bimonthly or as negotiated  
Bimonthly or as negotiated  
Quarterly or as negotiated

File Audits  
Inspections and Enforcement  
Permits and Closures  
Corrective Action

Annually at midyear  
Annually at midyear  
Annually at midyear

On-site Meetings

Annually at midyear; end-of-year;  
conference call before report issuance

Written Evaluation Reports

Midyear; end-of-year

Capability Assessment

Informal, in conjunction with authorization  
packages

Picture Reports

Based on WDS data, can be pulled anytime

### Laboratory Support

Estimates for laboratory support needs for FY09 are based on data generated by the MDEQ Environmental Laboratory for past analytical services and work that will result from the MDEQ's authorization of corrective action as of April 1996. Costs are divided into two categories to differentiate between samples collected during: (1) RCRA groundwater inspections (i.e., CMEs, O&Ms, and groundwater assessments) and (2) samples resulting from RCRA compliance and/or corrective action investigations. Although projected laboratory costs are chiefly for mandatory RCRA inspections, allowance has been included for additional sampling visits in support of RCRA closures, waste classification audits, and RCRA facility assessments. Estimates for laboratory support needs also include the time involved for special support of laboratory expertise regarding specific laboratory technology, methodology, and review of specified portions of Quality Assurance Project Plans (QAPPs).

All samples collected during sampling and compliance inspections will be analyzed in the MDEQ Environmental Laboratory, unless specialized analytical capability not available through the MDEQ Environmental Laboratory is required, i.e., high resolution mass spectrophotometry. All analyses conducted by the MDEQ will be performed in accordance with standard procedures contained in the 2006 (Revision 3) quality assurance manual entitled *Waste and Hazardous Materials Division, Quality Assurance Quality Control Manual for the Sampling and Analysis of Environmental Media* or subsequently approved revision. A copy of this manual was originally provided to the U.S. EPA following its completion (with the assistance of the U.S. EPA contractor) in February 1998; and it was officially approved by the U.S. EPA, Region 5, on December 16, 1998. Major updating was completed during FY01, and Revision 2 was submitted to the U.S. EPA, Region 5, in February 2001. A second major update was completed in FY06, and Revision 3 was submitted to the U.S. EPA, Region 5, in May 2006. Since this manual is lengthy and the procedures contained within do not frequently change, the MDEQ will review this document on a semiannual basis and perform minor revisions, as needed. The MDEQ will submit a fully updated copy of the manual to the U.S. EPA every five years (from the date of official U.S. EPA approval) unless substantial changes necessitate a release sooner. In addition to this MDEQ reference manual, the *U.S. EPA SW-846 Third Edition, Update IVB*, with revisions, will be used.

### Safety Training

The WHMD has developed a Health and Safety Program to ensure that staff, who perform duties at facilities where they may be exposed to hazardous chemicals, conduct tasks in the safest manner possible. The WHMD Health and Safety Program is designed to comply with Michigan's Occupational Safety and Health Administration standards, which includes the Michigan Hazardous Waste Operations and Emergency Response (HAZWOPER) regulations and all applicable MDEQ health and safety policies.

- All WHMD staff who conducts sampling and/or inspections at facilities where hazardous chemicals may be present is required to complete at least 24 hours of safety training designed to teach chemical awareness and toxicology and to familiarize them with personal protective equipment that may be required to perform tasks. All staff who has taken this training is required to complete an additional

8 hours of safety training annually to update their safety skills and to maintain their HAZWOPER certifications. Staff whose work duties require them to wear a respirator must complete an annual 4-hour respiratory protection refresher class, that includes a fit test, and they must be able to demonstrate that they understand and can apply the information learned during the session. WHMD staff is encouraged to take Cardiopulmonary Resuscitation (CPR), First Aid, and Automated External Defibrillator (AED) training and to maintain their certifications so that they can provide lifesaving skills if an emergency arises.

- The following training needs and costs are projected for FY09 based on current staffing levels and expected training costs:

<u>Training Needs</u>	<u>No. of Staff</u>	<u>Training Cost</u>
8-hour Annual Safety Training	65 staff	\$85/person
Annual Respirator Training and Fit Test	31 staff	\$50/person
CPR/First Aid Refresher/AED Training	65 staff	<u>\$49/person</u>

Total FY09 Safety Training Cost \$10,260

#### Financial Capability Program

The MDEQ will continue to use the state's TSD database to verify whether facilities are maintaining financial mechanisms as required by the rules. The MDEQ will send letters to owners/operators reminding them to update cost estimates, make payments into trust funds, and/or renew/replace mechanisms prior to their anniversary date. Deadlines will be tracked, and responses will be logged into the database. Owner/operators will be contacted again if no response is received or if the response is inadequate. In FY09 we expect to issue between 60 and 100 reminder letters.

This verification and notification process is possible because all TSDs and financial mechanisms are listed in the TSD database. The financial mechanisms are reviewed when received and rejected if inadequate. If a mechanism is listed in the database, it has the proper wording. The major concern is that the mechanism provides sufficient coverage and that it is updated and renewed/replaced on schedule. The database can be used to determine what types of coverage are required, to determine what the owner/operator has submitted to meet those requirements, and to identify the submittal deadlines.

The MDEQ has found this process is more effective than conducting facility-specific financial record reviews at only a limited number of facilities each year. This process highlights the inadequate financial demonstrations before they occur, putting the MDEQ in a proactive mode.

Data will be entered into WDS to demonstrate that a financial review has been completed. Because of this proactive approach, essentially all Michigan TSDs are in compliance with the financial capability requirements at any given time. To reflect this in WDS, the MDEQ will record an "in-compliance" financial record review (except when it does not apply) for the active TSDs in the Compliance and Enforcement Module in WDS. This reporting will be done periodically throughout the FY, but a financial record review will be recorded for at least one-quarter of all active TSDs by the end of the first quarter.

#### WDS/RCRAInfo Reporting

Michigan data for the Hazardous Waste Program is entered into WDS and translated to the U.S. EPA national hazardous waste database, RCRAInfo, for Handler, Permitting, Correction Action, Compliance and Enforcement, and Hazardous Waste (biennial) Reporting data. Any disruptions in translation or data comparison reports will be communicated to Mr. Dan Bakk, U.S. EPA, Region 5.

#### Compliance Monitoring and Enforcement Module

The MDEQ commits to maintaining WDS to reflect current compliance, monitoring, and enforcement activities in Michigan. This data will continue to be translated into RCRAInfo on a monthly schedule as soon as the work can be completed for changes in the flat files. Because a multi-year contract for work on WDS has not been obtained, the completion of this work will not be started again until the beginning of the FY09.

#### Handler Module and Biennial Reporting

The U.S. EPA identification numbers will continue to be issued through WDS and the identification numbers will conform to the required check-digit algorithm. This data will continue to be translated into RCRAInfo on a monthly schedule. The MDEQ will continue processing and submitting data for the 2009 biennial reporting cycle.

#### Permit Module

The MDEQ commits to maintaining WDS to reflect current permitting, closure, and postclosure activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters since the data cannot be translated through CDX. Monthly translation of permitting, closure, postclosure, and financial assurance activities may be effected by the release of RCRAInfo V4. The MDEQ will coordinate with U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate resulting from implementation of RCRAInfo V4.

#### Corrective Action Module

The MDEQ commits to maintaining WDS to reflect corrective action activities in Michigan, including facilities listed by the U.S. EPA as high priority under the federal GPRA. This data will continue to be translated into RCRAInfo on a monthly schedule by submitting flat files to U.S. EPA Headquarters since the data cannot be translated through CDX. Monthly translation of corrective action activities may be effected by the release of RCRAInfo V4. The MDEQ will coordinate with U.S. EPA and U.S. EPA Headquarters to maintain monthly translation and to resolve any inability to translate resulting from implementation of RCRAInfo V4.

#### Dual-Agency Linking and Data Consistency

The WHMD and the U.S. EPA will handle data corrections for entries with dual-agency linking within RCRAInfo Permitting, Compliance Monitoring and Enforcement, Corrective Action, and Compliance Modules according to the following procedures:

- The MDEQ will continue to translate the state handler, permitting, corrective action, and compliance and enforcement data into RCRAInfo as identified above.

- The translation of CME data will not be functional until the new multi-year contract is in place and changes are made. The MDEQ will run a query after each successful translation to determine which data reside in RCRAInfo, but do not reside in WDS. This could involve new data (possibly corrected) or updated data in WDS that require change in RCRAInfo.
- If the necessary changes in RCRAInfo reside within a record where the U.S. EPA is the implementer of record (IOR), MDEQ staff cannot make the changes. Therefore, the MDEQ will e-mail on a monthly basis the U.S. EPA database contact, Mr. Bakk, a list of any permitting, corrective action, or compliance and enforcement data changes that need to be made.
- Within three weeks from the date of the e-mail, the U.S. EPA will send the MDEQ a return e-mail iterating how changes were made in RCRAInfo or what changes have not been made and why. This will give MDEQ staff one week to make any changes required in RCRAInfo to completely synchronize the data with WDS and retain accuracy prior to the next translation.
- If U.S. EPA staff does not agree to a proposed change, they will discuss it with MDEQ staff.